

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHAEL ANNE ELROD, ANDREW KAUFMAN, and SARAH MARTIN, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NO TAX 4 NASH, MICHELLE FOREMAN, and JOHN DOES 1-10,

Defendants.

No. 3:20-cv-00617

**District Judge Eli J. Richardson
Magistrate Judge Barbara D. Holmes**

CLASS ACTION

JURY TRIAL DEMANDED

BROOKS BRASFIELD, on behalf of himself and others similarly situated,

Plaintiff,

v.

NO TAX 4 NASH and JOHN DOES 1-10

Defendants.

No. 3:20-cv-00618

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY DEADLINES

Plaintiffs Rachel Anne Elrod, Andrew Kaufman, Sarah Martin, and Brooks Brasfield (“Plaintiffs”), Defendants Michelle Foreman and Karen Moore (“Named Defendants”), and Third-Party Defendants Best Sellers, LLC and its principal Heather Sellers (the “Best Sellers Third-Party Defendants”); and Hypermetrics, LLC and Joe Gergley (the “Hypermetrics Third-Party Defendants”) (collectively, the “Parties”), by and through undersigned counsel, respectfully notify this Court that the Parties have reached an agreement in principle to resolve this lawsuit. The resolution was agreed to following multiple settlement discussions between the Parties. The Parties

are currently working to draft and finalize the settlement related documents and court filings. In light of the foregoing, the Parties request that the Court stay all proceedings and deadlines pending the filing of a motion for preliminary approval of settlement. In any event, the Parties will provide the Court with an update within the next thirty (30) days on their progress.

WHEREFORE, the Parties respectfully request that this Court enter an Order staying all proceedings and deadlines pending the Parties' completion of the settlement documents and filing a motion for preliminary approval of settlement.

Dated: February 10, 2022

Respectfully submitted,

/s/ Anthony A. Orlandi

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 10, 2022, the foregoing was served via the Court's electronic filing system upon all counsel of record.

/s/ Anthony A. Orlandi
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